

EXHIBIT A
ADDITIONAL ALLEGATIONS CONCERNING SEVENTH CAUSE OF ACTION-
NEGLIGENT HIRING AND SUPERVISION

1. In or about 2011, Defendant Canisius College hired Defendant Nathan Huckle and appointed him Head Coach of its combined men's and women's cross-country team.
2. Upon information and belief, prior to hiring Defendant Huckle, Defendant Canisius College either failed to adequately investigate his background and/or references, or ignored information in the course of doing so concerning Defendant Huckle's history of grossly inappropriate conduct toward and/or relationships with high school and/or middle school aged female students Defendant Huckle taught and/or coached in his previous employment.
3. Upon information and belief, prior to his employment with Defendant Canisius College, Defendant Huckle was employed by the Brighton Central School District as a teacher and a track and field and/or cross-country coach.
4. Upon information and belief, there were, and are, copious reports, information, and indications that during his employment with that school district, Defendant Huckle had inappropriate contact and/or relationships with underage female students who he taught and/or coached.
5. Upon information and belief, Defendant Huckle was forced, and/or allowed, to resign from his employment with the Brighton Central School District because of suspicions and/or accusations concerning his inappropriate contact and/or relationships with female students.
6. Upon information and belief, if Defendant Canisius College made appropriate inquiry and/or investigation into Defendant Huckle's background and previous employment, this information was readily available from numerous sources.

7. Upon information and belief, Defendant Canisius College either failed to make such inquiries or conduct such an investigation, or did so and ignored that information.
8. Because of that background, Defendant Huckle was not an appropriate individual for Defendant Canisius College to hire to coach young women who were members of its cross-country team.